

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Inna Pikulenko,

Plaintiff

v.

Michael Chertoff, Secretary,
U.S. Department of Homeland Security;
Emilio Gonzalez, Director, United
States Citizenship and Immigration
Services; Evelyn Upchurch
Director, Texas Service Center, United States
Citizenship and Immigration Services,
Mesquite, Texas

Defendants

Case No. 1:07-cv-2915

MOTION TO ADMIT COUNSEL PRO
HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the
Southern and Eastern Districts of New York, I, Ruchi Thaker, a member on good standing of the
bar of this Court, hereby move for an Order allowing the admission pro hac vice of

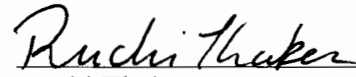
Vard R. Johnson
Suite 210
18 Tremont Street
Boston, Massachusetts 02108
1-617-557-1711
1-617-557-4711 Fax

Vard R. Johnson is a member in good standing of the Bar of the States of Nebraska and
Massachusetts. There are no pending disciplinary proceedings against Vard R. Johnson in any
State or Federal Court.

Dated this 9th day of July, 2007. New York City, New York

7-9-07
SCA
#25
6010009

Respectfully submitted,

A handwritten signature in cursive script, reading "Ruchi Thaker", is positioned above a horizontal line.

Ruchi Thaker

Thaker/Berowitz LLP

225 Broadway, Suite 3001

New York, New York 10007

Phone: (212) 513-1713

Fax: (212) 513-7737

rthaker@thakerlaw.com

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Naturalization Services, Mesquite, Texas,

Defendants

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AFFIDAVIT OF RUCHI THAKER
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE

State of New York)
) ss
County of New York)

Ruchi Thaker, being duly sworn, hereby deposes and says as follows:

1. I am familiar with the proceedings in the above referenced case and am local counsel to the Plaintiff for the filing. I am a member of the Bar of the State of New York and also am admitted to bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
2. I have filed with this Court a motion to admit Vard R. Johnson as counsel pro hac vice to represent Plaintiff in this matter.
3. I have known Vard R. Johnson since 2003.
4. Vard R. Johnson is admitted to the practice law in the State of Nebraska and the Commonwealth of Massachusetts.
5. I know Vard R. Johnson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Vard R. Johnson, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Vard R. Johnson, pro hac vice, which is attached hereto as Exhibit A.

Wherefore, it is respectfully requested that the motion to admit Vard R. Johnson pro hac vice to represent Plaintiff in the above captioned matter be granted.



Ruchi Thaker

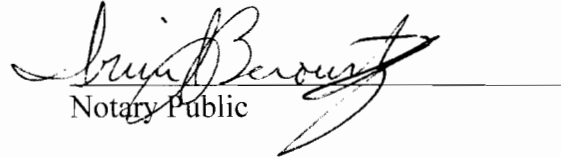
Thaker/Berowitz LLP

225 Broadway, Suite 3001

New York, New York 10007

Subscribed and sworn to before me a notary public this 9th day of July 2007.

IRWIN J. BEROWITZ
Notary Public, State of New York
No. 02BE5033479
Qualified in New York County
Commission Expires Sept. 19, 2010


Notary Public

SUPREME COURT
STATE OF NEBRASKA
CERTIFICATE OF GOOD STANDING

I certify that I am Clerk of the Supreme Court of the State of Nebraska, the highest court of the State, and that on June 22, 1964, Vard R. Johnson was admitted to practice as an Attorney and Counselor at Law by the Supreme Court. I further certify that the attorney is now in good standing in the Courts of Nebraska, and there is not now pending in this court any disciplinary action. The attorney's private and professional character appears to be good.



IN TESTIMONY WHEREOF, I have hereunto set my
hand and caused to be affixed the Seal of this Court,
in the City of Lincoln, on June 22, 2007.

A handwritten signature in cursive script, which appears to read "Janet H. Amussen", is written over a horizontal line.

Clerk

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **twenty-sixth** day of **April** A.D. **2004**, said Court being the highest Court of Record in said Commonwealth:

Vard R. Johnson

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **eleventh** day of **June** in the year of our Lord **two thousand and seven**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

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Mesquite, Texas

Defendants

Case No. 1:07-cv-2915

ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION

Upon the Motion of Ruchi Thaker, local counsel for Plaintiff, and said counsel's affidavit in support;

IT IS HEREBY ORDERED THAT

Vard R. Johnson
Suite 210
18 Tremont Street
Boston, Massachusetts 02108
1-617-557-1711
1-617-557-4711
vardinboston@verizon.net

is admitted to practice pro hac vice as counsel for Inna Pikulenko in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing

discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

United States District/Magistrate Judge

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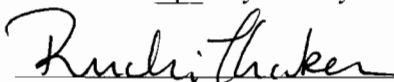
Defendants

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PROOF OF SERVICE

I, Ruchi Taker (RT 4210), local counsel for the Plaintiff state that I served on F. James Loprest, Jr. (FJL:3210), Special Assistant United States Attorney, Southern District of New York, 86 Chambers Street, 4th Floor, New York, New York 10007, by United States mail, postage prepaid, on July 9, 2007, my Motion to Admit Counsel Pro Hac Vice, Affidavit in Support of the Same, and Certificates of Good Standing.

Dated this 9 day of July 2007.



Ruchi Thaker

Thaker/Berowitz LLP
225 Broadway, Suite 3001
New York, New York 10007
Phone: (212) 513-1713
Fax: (212) 513-7737
rthaker@thakerlaw.com